be liable to prosecution for misdemeanor and punishment by imprisonment. This law was enacted principally to constitute a weapon to compel especially negro farm laborers to perform the service required by their contracts of employment on pain of being sent to jail or being made members of the chain-gang. The United States District Court for the District of South Carolina in Ex parte Drayton, 153 Federal Reporter, 986, holds this law unconstitional, as violating the thirteenth and fourteenth amendments of the federal Constitution, and as not being a valid exercise of the police power of the state.

Draftsman as Fellow Servant with Elevator Man.—The New York Supreme Court in Fouquet *v.* New York Central & Hudson River Ry. Co., 103 New York Supplement, 1105, held that a draftsman in the employ of the engineering department of the New York Central Railroad was a fellow servant with a man running the elevator in the Grand Central Depot in New York, in which the draftsman worked.

Validity of Labor Law.—The validity of the New York law prohibiting the employment of females, regardless of age, in factories between 9 o'clock p. m. and 6 o'clock a. m., came up for final determination by the state courts in People *v.* Williams, 81 Northeastern Reporter, 778. The Court of Special Sessions of the First Division of the City of New York (100 New York Supplement, 377) held the law unconstitutional as infringing the constitutional right to contract. This decision was affirmed by the Appellate Division by a divided court (101 New York Supplement, 562, 116 App. Div. 379). The Court of Appeals now affirms the decision of the court below, and holds the law unconstitional on the same grounds as the Court of Special Sessions. The court says that the courts have gone very far in upholding legislative enactments framed clearly for the welfare, comfort, and health of the community; but when it is sought, as here, arbitrarily to prevent an adult femal citizen from working at any time of the day that suits her, it is time to call a halt. Such a law arbitrarily deprives citizens of their right to contract with each other.

Use of Public Streets by Interurban Railroads.—The extensive development of interurban railroads is gradually narrowing the distinction between the right of commercial railroads, or so-called steam railroads, and street railroads proper, as interurban roads in many instances partake of the nature of both. In Kinsey *v.* Union Traction Company, 81 Northeastern Reporter, 922, decided by the Indiana Supreme Court, one of the main contentions was whether or not interurban cars, operated on the streets of a city with its permission, for the carriage of passengers, express, and light freight by a corporation unorganized under the street railway laws, constituted an

additional servitude on the streets so as to entitle abutting owners to additional compensation for the use of the streets. Three of the judges, Chief Justice Hadley, Justices Gillett and Monks, were of the opinion that the operation of the cars did not constitute an additional servitude, while two judges, Justices Jordan and Montgomery, held the contrary.

Correction of Birth Record.—The decision of Judge Dill of the New Jersey Court of Errors and Appeals in Vanderbilt *v.* Mitchell, 67 Atlantic Reporter, 97, serves admirably to illustrate that the powers of a court of equity are adequate to meet the demands made thereon by constantly changing social conditions. In this case it appears that a birth certificate was made by the physician present at the birth of a child. This certificate set forth, among other things, the time, the date and place of the birth of the child, the name of each of the parents, the maiden name of the mother, and the name of the child. It appears that in making the certificate the physician was imposed upon by false statements of the mother as to the paternity of the child, and certified, contrary to the fact, that complainant in this suit was the father of the child. Judge Dill holds that the court has power to correct the record.

Leadership of Zion City Colony.—The United States Circuit Court for the Northern District of Illinois in Holmes *v.* Dowie, 148 Federal Reporter, 634, passes on the question of leadership of the organization founded by Dowie by saying that, as a general rule, the court will recognize the action of a religious society in this respect, but inasmuch as the organization has no regulation providing how a leader shall be selected, it seems fair that the majority rule shall prevail. An election was therefore ordered, at which all male and female members of the organization over twenty-one years of age were granted the right to vote.

Right of Personal Privacy.—Thomas A. Edison, the noted inventor, is, in Edison *v.* Edison Polyform Manufacturing Company, 67 Atlantic Reporter, 392, granted an injunction by the New Jersey Court of Chancery to prevent the unauthorized use of his name by another as a part of its corporate title, or, in connection with its business or advertisements, his pictures and his pretended certificate indorsing a remedy which such other is engaged in manufacturing, compounded according to a formula devised by Mr. Edison, though he is not a business competitor. See article in 12 Va. Law Reg. p. 91.

Goats as Fixtures.—To lawyers in common-law states the decision of the United States Circuit Court for the Eastern District of Louisiana, in Morton Trust Company *v.* American Salt Company, 149